

**To:** Jeryl Gardner[jgardner@ndep.nv.gov]  
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**From:** Peggy Pauly  
**Sent:** Tue 12/20/2016 5:00:28 PM  
**Subject:** YCAG comments

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Jeryl R. Gardner, P.E., C.E.M.  
NDEP Anaconda Mine PM  
901 S. Stewart St., Suite 4001  
Carson City, Nevada 89701

December 14, 2016

Dear Mr. Gardner,

The Yerington Community Action Group (YCAG) comments on the Proposed Plan for Operable Unit 8 are as follows:

We understand, even with the site being placed on the NPL, money is an issue. We are taking the cost for the remedies into account and realize the State of Nevada will have responsibility for 10% of the cleanup costs.

We do not want to see Alternatives #one or # two. We do not see either of them as valid to protect human health or the environment.

Alternative # three: We favor using the four foot cover for the heaps. We believe the added thickness would add protection. We do not favor this alternative because it does not have a plan to deal with the stormwater management.

Alternative #four: Seems to be the best option in regards to cost and effectiveness. We are concerned with some of the issues with this alternative.

1. We are concerned with using only the 2 foot cover. We would request there be a moisture sensor installed under the cap to make sure this is adequate. We also want to make clear that the VLTs would not be used as a cap. We know in the past they were being considered and then found to be a continuing source of contamination.

We are concerned with the vegetation used to cover and stabilize the cap. We have been assured only native grasses with root systems that spread will be used to protect from a root system that would break through the cap and go deeper into the contaminated portion of the heaps.

2. We are also concerned with the use of modified evaporation. In the past, spraying on the site did result in releases to neighboring properties. There is continued dust seen blowing on the site. We would request air monitoring to resume if there is any spraying

used to enhance evaporation.

3. We do see stormwater running off the site during heavy rain events. We hope there is a comprehensive stormwater plan to address this issue.

4. Is there still a possibility of the State deferring the listing? We are concerned because we have heard this is still on the table. How would this affect the cleanup of OU 8 moving forward?

We do believe that the big problems concerning this unit of the site will be addressed (for now) using Alternative #4.

Respectfully submitted,

Yerington Community Action Group  
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Yerington, Nevada 89447

Point of Contact: Peggy Pauly